

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

GEORGIA-PACIFIC CONSUMER
PRODUCTS LP,
FORT JAMES CORPORATION, and
GEORGIA-PACIFIC

Plaintiffs,

v.

NCR CORPORATION,
INTERNATIONAL PAPER CO., and
WEYERHAEUSER CO.,

Defendants.

No. 1:11-cv-00483

**DECLARATION OF YONATAN EVEN IN
SUPPORT OF OPPOSITION TO PLAINTIFFS' MOTION TO
DETERMINE SUFFICIENCY OF DEFENDANT'S ANSWERS AND
OBJECTIONS TO FIRST PHASE II REQUESTS FOR ADMISSION**

I, Yonatan Even, declare and say:

1. I am partner with Cravath, Swaine & Moore LLP, which represents Defendant NCR Corporation ("NCR") in the above-captioned action (the "Action"). I submit this declaration in support of NCR's Opposition to GP's Motion to Determine Sufficiency of NCR's Answers and Objections to First Phase II Requests for Admission. I have personal knowledge of the facts set forth in this Declaration and am fully competent to testify in the Action.

2. Counsel for NCR spent many hours reviewing documents produced in this case and otherwise, conferring with NCR's in-house counsel and preparing NCR's Responses and Objections to Georgia-Pacific's First Phase II Requests for Admission (the "Responses").

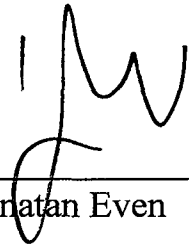
3. On November 24, 2014, NCR met and conferred with GP about the Responses.

4. During the meet and confer, GP demanded that NCR admit without qualification 21 RFAs GP identified in a letter, dated November 19, 2014 (Ex. 1 to NCR's Opp., Letter from Nyffeler to Even, dated November 19, 2014). GP took the position that no explanation of NCR's responses would suffice, nor was there any middle ground to be reached.

5. NCR, in a good faith effort to resolve the dispute, explained why it gave the responses it did and asked GP to identify evidence that it contended required NCR to admit certain requests. NCR also informed GP that as an accommodation, it would further supplement its responses to address any alleged deficiency on November 25, 2014. Finally, NCR requested that GP not move the Court prematurely, prior to reviewing NCR's supplemental responses.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 12, 2014.



Yonatan Even

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2014, I electronically filed the Declaration of Yonatan Even in Support of Opposition to Plaintiffs' Motion to Determine Sufficiency of Defendant's Answers and Objections to First Phase II Requests for Admission, using the Court's ECF system, which will send notification of such filing by operation of the Court's electronic system. Parties may access this filing via the Court's electronic system.

/s/ David R. Marriott
Counsel for NCR Corporation